

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MAXRELIEF USA, INC.,

Counter-Plaintiff,

v.

PAINAWAY AUSTRALIA PTY
LIMITED CAN 151 146 977 and MUCH
SHELIST, P.C.,

Counter-Defendants.

CIVIL ACTION

No. 18-cv-3854-MSG

**COUNTER-DEFENDANTS' MOTION *IN LIMINE*
TO LIMIT COUNTER-PLAINTIFF'S DAMAGES**

Counter-Defendants Painaway Australia Pty Limited Can 151 146 977 and Much Shelist, P.C., by and through their attorneys, respectfully move this Court for an Order *in limine* precluding Counter-Plaintiff MaxRelief USA, Inc. from introducing four self-created summaries of projected lost profits damages at trial and otherwise limiting the scope of damages MaxRelief can assert. In support of this Motion, Counter-Defendants submit the enclosed Memorandum of Law and Proposed Order.

Date: June 14, 2024

Respectfully submitted,

FISHER & PHILLIPS LLP

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*Painaway Australia PTY Limited CAN
151 146 977 and Much Shelist P.C.*

CERTIFICATE OF SERVICE

I certify that on the date set forth below, the foregoing was electronically filed pursuant to the Court's ECF system and that the documents are available for downloading and viewing from the ECF system. Notice of this filing will be sent to all parties by operation of the ECF system.

Date: June 14, 2024

/s/ Andrew S. Gallinaro
Andrew S. Gallinaro